

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Chapter 7 Trustee

In Re:

HAAS ENVIRONMENTAL, INC.

Debtor.

Chapter 7

Case No. 13-27297-KCF

Judge: Hon. Kathryn C. Ferguson

Hearing Date: October 17, 2017

Hearing Time: 11:00 a.m.

**NOTICE OF MOTION FOR ENTRY OF AN ORDER AUTHORIZING SALE OF REAL
PROPERTY IN OHIO AND AUTHORIZING COMPENSATION TO AUCTIONEER
AND REALTOR**

PLEASE TAKE NOTICE that on October 17, 2017 at 11:00 a.m., or as soon thereafter as counsel may be heard, Catherine E. Youngman, Chapter 7 trustee (the “Trustee”) for Haas Environmental, Inc., by and through her counsel, Fox Rothschild LLP, will move before the Honorable Kathryn C. Ferguson, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order (1) authorizing the sale of commercial property located at 4221 Sunset Boulevard, Steubenville, Ohio 43952, pursuant to 11 U.S.C. § 363(b) and (f); (2) authorizing compensation to the Trustee’s auctioneer, Auction Advisors, and realtor, Guida Realty, for their services pursuant to D.N.J. LBR 6004-5; and (3) granting such

other and further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Trustee's Motion, the undersigned shall rely upon the certification and memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Trustee's and undersigned counsel at 49 Market Street, Morristown, New Jersey 07960, no later than seven (7) days prior to the return date.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, this motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the relief sought herein may be granted without a hearing.

FOX ROTHSCHILD LLP
Attorneys for Chapter 7 Trustee

By: /s/Michael R. Herz
Michael R. Herz, Esq.

Dated: August 30, 2017